

February 15, 2011

To whom it may concern:

This response will focus on the technical aspects of the comments submitted by the stakeholders in response to the California Proposed Rulemaking for Trustworthy Electronic or Records Preservation. Comments that are not dealing directly with the technologies are not covered in this response.

TIFF was a file format that was used throughout the industry in the absence of any ISO or otherwise standardized file format. TIFF was originally developed by Aldus Corporation which was later acquired by Adobe Systems, Inc. Adobe Systems owns the copyright on the TIFF specification and controls the development and enhancement of the TIFF specification. As this is a specification, software developers have the ability to choose to use any, all or none of the structures defined in the specification. This is the reason AIIM ARP-1 says to execute caution when using TIFF as you must make sure everything is fully documented related to the structures, color maps and compression methods to ensure that the TIFF file you are creating is accurate. Organizations are discouraged from using wrappers or encrypting the files without ensuring that you are able to retrieve this information in a reliable fashion over time.

The PDF/A file format which is identified in the proposed regulation is an ISO (International Organization for Standardization) standard, ISO 19005, Document management – Electronic document file format for long-term preservation (written in multiple parts). ISO 19005 was developed using the ISO procedures which specifies the development and approval process for standards that bear the ISO logo. The ISO procedures stipulate that each ISO member country may have only one (1) vote on the approval of a document. There are no company members in ISO only country members. The ISO working group that developed PDF/A is a joint working group comprised of subject experts from four ISO Technical Committees. As an additional safeguard, the number of representatives from each company is also monitored so that one company may not exert more control on a standard than another company. Both the ISO 19005 (PDF/A) and ISO 32000 (PDF) working groups have subject

experts from companies other than Adobe Systems. (Microsoft regularly sends subject experts to these working group meetings.)

The Library of Congress (<http://www.digitalpreservation.gov/formats/sustain/sustain.shtml>) and the National Archives and Records Administration (NARA) (<http://www.archives.gov/records-mgmt/initiatives/sustainable-faq.html>) have defined sustainability characteristics for file formats. These characteristics or factors help to define the suitability of digital formats for the purposes of preserving digital information. One of the factors is "Technical Protection Mechanisms". According to the Library of Congress, "Content for which a trusted repository takes long-term responsibility must not be protected by technical mechanisms such as encryption, implemented in ways that prevent custodians from taking appropriate steps to preserve the digital content and make it accessible to future generations." NARA goes further to state that "Long-term records should be unrestricted and/or unencrypted so that user IDs and/or passwords are not needed to maintain the file. User IDs and passwords can be lost over time."

There are over 2,000 PDF products that exist today. A listing of these products can be found at PlanetPDF (www.planetpdf.com/tools_listing1.asp). In addition, there are over 50 products that create or read PDF/A files. A listing of those products can be found at <http://www.aiim.org/Resources/Standards/Articles/PDFA-Compliant-Products>.

Sincerely,



Betsy Fanning
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AIIM